

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ANDREW ANANIA

No. 19 CR 532

Judge Sharon Johnson Coleman

MOTION TO QUASH WARRANT

Andrew Anania, by the Federal Defender Program and its attorney Santino Coleman, respectfully requests that this Court quash the bench warrant pending in this matter. In support of this motion, Mr. Anania states the following:

On December 14, 2020, the pretrial officer issued a violation report, indicating that Mr. Anania's whereabouts were unknown after making several attempts to contact him, and following attempts to determine whether he was at Stroger Hospital receiving emergency medical treatment for breathing difficulties. The following day, on December 15, 2020, this Court issued a bench warrant for Mr. Anania's arrest.

On December 16, 2020, Mr. Anania spoke with pretrial officer Pace Morrison (as undersigned counsel confirmed with Mr. Morison), explaining that he sought treatment at Mount Sinai Hospital, where he was held overnight (from December 13, 2020 until December 14, 2020) for observation by medical staff. Given Mr. Anania's whereabouts are known and because he is now in touch with pretrial services, Mr. Anania requests that the bench warrant be quashed, and that a hearing be scheduled to address the violation report.

This request is also being made in light of the significant COVID-19 outbreak at the Metropolitan Correctional Center, Chicago (MCC), where Mr. Anania would likely be placed

upon arrest. Since his release on bond, Mr. Anania has been receiving essential medical treatment and undergoing tests, all of which he cannot receive in custody. Moreover, the recent surge in COVID-19 throughout the MCC, and the other facilities where federal pretrial detainees are held, demonstrates that Mr. Anania's arrest would place him at heightened risk of contracting a serious form of COVID-19 due to his medical problems (particularly Lupus).

Because Mr. Anania is presently in touch with pretrial services and his whereabouts are known, and given the other reasons noted above, Mr. Anania respectfully requests that the bench warrant be quashed, and that a hearing be set to address the violation report.

Respectfully submitted,

Federal Defender Program
John F. Murphy
Executive Director

By: /s/ Santino Coleman

CERTIFICATE OF SERVICE

The undersigned, Santino Coleman, an attorney with the Federal Defender Program hereby certifies that in accordance with FED.R.CRIM. P. 49, FED. R. CIV. P5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document(s):

MOTION TO QUASH WARRANT

was served pursuant to the district court's ECF system as to ECF filings, if any, and were sent by first-class mail/hand delivery on December 16, 2020, to counsel/parties that are non-ECF filers.

FEDERAL DEFENDER PROGRAM
John F. Murphy
Executive Director

By: s/ Santino Coleman
Santino Coleman

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